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November 29, 2006

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

Re: CC Dkt. No. 94-129; Certification of Exemption from "Drop-Off" Requirement

Dear Ms. Dortch:

Business Network Long Distance, Inc. ("BNLD"), by its undersigned counsel, hereby certifies that it qualifies for an exemption from the "drop-off" requirement set forth in 47 C.F.R. Section 64.1120.

In its decision in CC Dkt. No. 94-129, the Commission established a mechanism by which carriers certifying as to their inability to comply with the "drop-off" rule will be exempt from that rule for a two-year period. See Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers, CC Docket No. 94-129, Third Order on Reconsideration and Second Notice of Proposed Rulemaking, 68 Fed. Reg. 19152 & 19176 (rel. March 17, 2003).

The telemarketing companies used by BNLD lack the technical capability to comply with the FCC's "drop off" rule. Specifically, the technology used by BNLD's telemarketing providers does not allow the person initiating a three-way call to "drop off" the line without also disconnecting the three-way call. Upgrading to a system that would allow BNLD's telemarketers to "drop-off" once a three-way call is initiated would be prohibitively costly for a company of BNLD's size. This precludes BNLD from complying with the "drop-off" rule. A certification signed by Brian Curtiss, President of BNLD, made in support of these statements under Section 1.16 of the Commission's rules is enclosed herewith.

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Questions regarding this certification should be addressed to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas K. Crowe', with a large, stylized initial 'T' and 'C'.

Thomas K. Crowe,
Counsel for Business Network Long
Distance, Inc.

Enclosure

cc: David Marks, Federal Communications Commission

CERTIFICATION

I, Brian Curtiss, certify that I am President of Business Network Long Distance, Inc. ("BNLD") and that I am authorized to make this certification for BNLD. Further, I certify that BNLD is unable to comply with the "drop off" requirement as set forth in 47 C.F.R. Section 64.1120. Specifically, the technology used by BNLD's telemarketing providers does not allow the person initiating a three-way call to "drop off" the line without also disconnecting the three-way call. Upgrading to a system that would allow BNLD's telemarketers to "drop-off" once a three-way call is initiated would be prohibitively costly for a company of BNLD's size. This precludes BNLD from complying with the "drop-off" rule. I hereby certify that to the best of my knowledge and belief, under penalty of perjury, the foregoing statements are true and correct.

Executed on ~~NOV 22 2006~~



Brian Curtiss
President,
Business Network Long Distance, Inc.